

Hearing Date: September 26, 2013 at 10:00 A.M. (EDT)
Response Deadline: September 19, 2013 at 4:00 P.M. (EDT)

BUTZEL LONG, a professional corporation
150 West Jefferson, Suite 100
Detroit, MI 48226
(313) 225-7000
Thomas B. Radom
Bruce L. Sendek
David J. DeVine
Attorneys for Reorganized Debtors

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re)	
)	Chapter 11
DPH HOLDINGS CORP., <i>et al.</i> ,)	
)	Case No. 05-44481 (RDD)
)	Jointly Administered
)	
Reorganized Debtors.)	

**NOTICE OF REORGANIZED DEBTORS' MOTION FOR ORDER (I) ENFORCING
(A) MODIFIED PLAN AND PLAN MODIFICATION ORDER INJUNCTIONS,
(B) OPEB ORDERS, AND (C) RECOUPMENT ORDER; (II) ENJOINING JAMES
SUMPTER'S SECOND LAWSUIT FILED IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT OF INDIANA AND REQUIRING
JAMES SUMPTER TO DISMISS THE INDIANA ACTION
WITH PREJUDICE; AND (III) HOLDING JAMES SUMPTER
IN CONTEMPT AND AWARDING OTHER SANCTIONS**

PLEASE TAKE NOTICE that on September 26, 2013, DPH Holdings Corp. ("DPH Holdings") and certain of its affiliated reorganized debtors in the above-captioned cases (collectively, the "Reorganized Debtors"), successors to Delphi Corporation ("Delphi") and certain of its subsidiaries and affiliates, former debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), together with certain of their agents, representatives, and officers, filed a *Motion For Order (I) Enforcing (A) Modified Plan and Plan Modification Order Injunctions, (B) OPEB Orders, and (C) Recoupment Order; (II) Enjoining*

James Sumpter's Second Lawsuit Filed in the United States District Court for the Southern District of Indiana and Requiring James Sumpter to Dismiss the Indiana Action With Prejudice; and (III) Holding James Sumpter in Contempt and Awarding Other Sanctions ("Sumpter Injunction Motion II") (Docket No. 22138) (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion will be held on September 26, 2013 at 10:00 A.M. (prevailing Eastern time) (the "Hearing") before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, Courtroom 118, White Plains, New York 10601-4140.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, the Supplemental Order Under 11 U.S.C. §§ 102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing Omnibus Hearing Dates And Certain Notice, Case Management, And Administrative Procedures, entered March 20, 2006 (Docket No. 2883) ("Supplemental Case Management Order"), and the Twenty-Ninth Supplemental Order Under 11 U.S.C. §§ 102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing Omnibus Hearing Dates And Certain Notice, Case Management, And Administrative Procedures, entered May 13, 2013 (Docket No. 22058) (together with the Supplemental Case Management Order, the "Case Management Orders"), (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court's case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy

Judge, and (e) be served upon (i) DPH Holdings Corp., 5725 Delphi Drive, Troy, Michigan 48098 (Att'n: President), (ii) counsel to the Reorganized Debtors, Butzel Long, 150 West Jefferson, Suite 100, Detroit, Michigan 48226 (Att'n: Thomas B. Radom, Bruce L. Sendek and David J. DeVine), (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004 (Att'n: Brian Masumoto), and (iv) counsel for the agent under the Debtors' former postpetition credit facility, Davis Polk & Wardell, 450 Lexington Avenue, New York, New York 10017 (Att'n: Donald S. Bernstein and Brian M. Resnick) in each case so as to be received no later than 4:00 P.M. (prevailing Eastern time) on September 19, 2013.

PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein and in accordance with the Case Management Orders will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed and served in accordance with the procedures set forth herein and in the Case Management Orders, the Bankruptcy Court may enter an order granting the Motion without further notice.

Dated: Detroit, Michigan
September 6, 2013

BUTZEL LONG, a professional corporation

By: /s/ David J. DeVine
Thomas B. Radom
Bruce L. Sendek
David J. DeVine
150 West Jefferson, Suite 100
Detroit, Michigan 48226
(313) 225-7000

Attorneys for Reorganized Debtors